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Suite 1020  
1401 H Street, N.W.  
Washington, D.C. 20005  
Office 202/326-3821  
Fax 202/326-3826



**Lynn Shapiro Starr**  
Vice President  
Regulatory Affairs

March 25, 1999

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas, Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re. Ex Parte Presentation  
CC Docket 96-98 ✓

Dear Ms. Salas:

Attached is a written ex parte in response to a staff request for cost information regarding Ameritech's Shared Transport Proposal (see Ex Parte Statement in CC Docket 96-98 filed March 5, 1999).

Pursuant to the Commission's rules, two copies of this written ex parte are being provided for inclusion in the above referenced docket.

Sincerely,

A handwritten signature in cursive script that reads "Lynn Starr".

Attachment

cc: Carol Matthey  
Jake Jennings

No. of Copies rec'd  
List ABCDE

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## ST-Transit Service in Conjunction with FCC Shared Transport

This Transit Service (ST-Transit Service) is available to work in conjunction with the Shared Transport as provided and described by the FCC's Third Order on Reconsideration and Further Notice of Proposed Rulemaking (FCC 97-295).

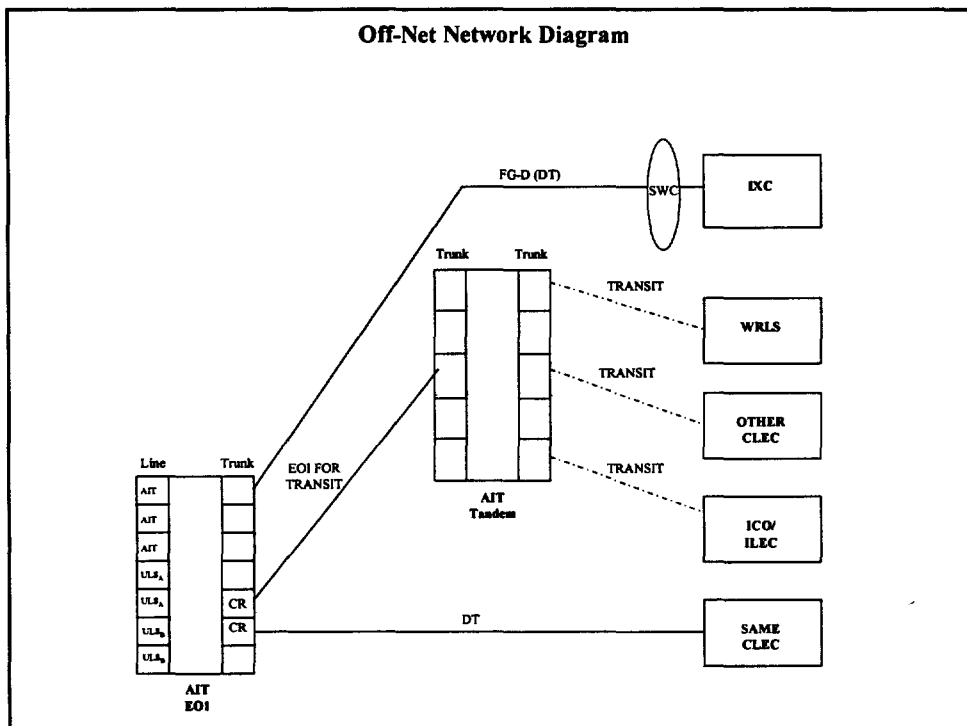
### DESCRIPTION

The ST-Transit Service will be provided to work in conjunction with the Shared Transport. (Shared Transport is described in the Ohio Functional Description Tab 1 of the Ohio Cost Study, case # 96-922-TP-UNC.)

Ameritech's existing Transit Service is defined and structured as a service between two parties external to Ameritech's network. Therefore, there was a need to create a new transit function which allows CLECs, who subscribe to Ameritech's ULS and Shared Transport, to originate traffic and complete it through Ameritech's network to other switches owned by 3<sup>rd</sup> parties.

Ameritech will provide ST-Transit Service as a substitute for the dedicated transport requirement defined by the FCC to 3<sup>rd</sup> party switches. This transit function is detailed under the terms and conditions of this document.

All traffic to non-Ameritech switches will utilize either dedicated transport (not Shared Transport) or the ST-Transit Service, where applicable. See the following diagram.



ST-Transit Service in Conjunction with  
FCC Shared Transport

**TERMS & CONDITIONS**

Access to ST-Transit Service is only provided through ULS line ports subscribed to by the CLEC for the CLEC's end users and in conjunction with Ameritech's Shared Transport.

For all local exchange traffic to non-Ameritech switches originated by its end users and destined to a 3<sup>rd</sup> party's switch, the CLEC must do one of the following:

- establish their own dedicated transport between the two offices
- or use a dedicated EOI transit trunk between the end office and the tandem, and Ameritech's ST-Transit service at the tandem

To use ST-Transit Service to reach a 3<sup>rd</sup> party's switch the CLEC is subject to the following:

- Establishing a ULS trunk port at each Ameritech end office switch location where subscribing to ULS and at the tandem
- Establishing EOI Local and IntraLATA Toll trunk group(s) to the tandem(s)
- Establishing unique routing in each Ameritech end office switch to direct off-net traffic to these dedicated routes (i.e., all traffic that neither terminates at a switch owned by Ameritech nor the requesting CLEC)
- Charges related to ST-Transit Service

All necessary dedicated transport and EOI transit routes must be in place at the time the CLEC begins the use of Shared Transport.

Since switches do not identify all carriers involved with a call, an Originating Carrier Pays (OCP) concept will apply for local and intraLATA traffic:

- The originating ULS carrier will be billed for originating and terminating switching and shared transport and applicable terminating charges for calls to 3<sup>rd</sup> party switches
- AIT will complete calls from 3<sup>rd</sup> party switches; AIT will bill the originating carrier
- The terminating carrier will not be charged for incoming traffic and therefore will incur no incremental cost
- Because the originating carrier will incur the cost, compensation to the terminating carrier will not be necessary
- All local and intraLATA traffic will be billed from the originating record
- Terminating records are not available and will not be required

**COST**

The costs that are being provided here are only for ST-Transit Service and the necessary EOI trunk to the tandem. They do not include any additional cost components for ULS and Shared Transport.

The cost details provided identify the cost components and do not suggest a rate element or rate structure.

No demand has been included, only cost components.

The following are the cost components that have been identified for ST-Transit Service:

- EOI trunk and dedicated trunk ports at the end office and tandem
- Custom routing at each end office
- The use of switching at the tandem
- The use of a shared trunk port at the tandem
- The use of AIT shared facilities to the 3<sup>rd</sup> party
- The charge for recip comp from the 3<sup>rd</sup> party
- Billing changes depending on the rate structure chosen
- Development and training of line organizations Methods & Procedures
- Development and publishing of customer documentation

